

ORIGINAL

FILED IN OPEN COURT
U.S.D.C. Atlanta

JUN 10 2014

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

JAMES N. HATTEN, Clerk

By: *pam* Deputy Clerk

UNITED STATES OF AMERICA

v.

OLANREWAJU SAHEED BELLO
A/K/A ANTONY ABEGUNRIN
ADABA
A/K/A ANTHONY ADABA
A/K/A JAMES RICHARD

AND

OLUWAMATEMI ADUKE ALABI
A/K/A OLUWATEMI ALABI

Criminal Indictment

No. **1:14-CR-213**

THE GRAND JURY CHARGES THAT:

Count One

18 U.S.C. § 1543

(Passport Fraud)

1. On or about February 18, 2014, in the Northern District of Georgia, the defendant, OLANREWAJU SAHEED BELLO, a/k/a ANTONY ABEGUNRIN ADABA, a/k/a ANTHONY ADABA, a/k/a JAMES RICHARD, did willfully and knowingly use and attempt to use a false, forged, and counterfeited passport, that is, a United Kingdom passport issued in the name of James Richard, with a passport number ending in 1908, in that BELLO presented said passport, which was false, forged, and counterfeited, as his own identification, in

order to authorize an international wire transfer of funds from a SunTrust bank account held in the name of Olushi LLC, with an account number ending in 8550, to an HSBC Bank Plc account, with an account number ending 8918, located in Great Britain.

In violation of Title 18, United States Code, Sections 1543 and 2.

Count Two

18 U.S.C. § 1543

(Passport Fraud)

2. On or about March 11, 2013, in the Northern District of Georgia, the defendant, OLUWAMATEMI ADUKE ALABI a/k/a OLUWAMATEMI ALABI a/k/a OLUWATEMI ALABI (hereinafter "ALABI"), did willfully and knowingly use and attempt to use a false, forged, and counterfeited passport, that is, a Nigerian passport issued in the name of "Oluwatemi Alabi," with a passport number ending in 1409, in that ALABI presented said passport, which was false, forged, and counterfeited, as her own identification, in order to open two Wells Fargo bank accounts, with account numbers ending in 1082 and 1330.

In violation of Title 18, United States Code, Sections 1543 and 2.

Count Three

18 U.S.C. § 1956(h)

(Conspiracy to Engage in Monetary Transactions in Property Derived from Specified Unlawful Activity)

The Conspiracy

3. From at least on or about September 30, 2013 through at least March 13, 2014, in the Northern District of Georgia and elsewhere, the defendant, OLANREWAJU SAHEED BELLO, a/k/a ANTONY ABEGUNRIN ADABA, a/k/a ANTHONY ADABA, a/k/a JAMES RICHARD (hereinafter "BELLO") did knowingly combine, conspire, and agree with Co-conspirator A and other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1957, to wit: to knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is, wire transfers from the SunTrust Bank account with a number ending in 8550, in the amounts of \$120,000 and \$150,000, to HSBC Bank PLC, in Coventry, Great Britain, and Emirates NBD Bank PJSC, in Dubai, United Arab Emirates, respectively, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

Manner and Means

The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

The "James Richard" and Olushi Bank Accounts

4. From September 2013 through October 2013, at the instruction of Co-conspirator A, BELLO opened numerous bank accounts in the name of "James Richard," at various financial institutions, including SunTrust Bank, JP Morgan Chase Bank, PNC Bank, Bank of America, and TD Bank.

5. In order to open these accounts in the name of "James Richard," BELLO presented as identification a United Kingdom passport, with a number ending in 1908, that was purportedly issued to "James Richard."

6. In fact, the "James Richard" passport was a false, forged, and counterfeited passport that had been mailed to BELLO by Co-conspirator A for the purpose of opening bank accounts using a false identity. The government of the United Kingdom had never issued the "James Richard" passport to BELLO.

7. On October 29, 2013, Olushi LLC, a limited liability company, was registered in the State of Georgia, with "James Richard" as the organizer.

8. On November 19, 2013, BELLO opened a SunTrust Bank account, with an account number ending in 8550, in the name of Olushi LLC ("the Olushi account"). The authorized signer on the account was "James Richard," and the identification presented was the false "James Richard" passport.

9. At all times material to this Indictment, SunTrust Bank was a financial institution as defined in Title 18, United States Code, Section 20, and its deposits were insured by the Federal Deposit Insurance Corporation.

The Fraudulent Funding of the Olushi Account

10. In or about February 2014, a hacker accessed the email account of an employee at Top Quality Truck & Equipment ("Top Quality"), a company based in Tampa, Florida, which conducts business with Arrow Truck Sales, Incorporated ("Arrow"), a company based in Kansas City.

11. The hacker operated a "man in the middle" scheme, where he was able to intercept and send emails between the two accounts. As a result, the two employees believed that they were corresponding with each other, when in fact, the hacker was controlling their email conversation.

12. By covertly monitoring the Top Quality employee's email account, the hacker learned that Top Quality was planning to sell twelve Mack trucks to Arrow.

13. On February 11, 2014, the hacker sent a false email that appeared to be from the Top Quality employee to the Arrow employee, directing Arrow to wire payment for the trucks to a SunTrust bank account - the Olushi account.

14. Believing that it was paying Top Quality for the twelve Mack trucks, on February 12 and 13, 2014, Arrow sent two wires from its bank account to the Olushi account, in the amounts of \$429,000 and \$141,000.

Laundrying of the Arrow Funds from the Olushi Account

15. After the Arrow funds were transferred into the Olushi account, on February 14, 2014, BELLO purchased a cashier's check in the amount of \$45,350 from the Olushi account, using the "James Richard" passport to authorize the withdrawal. The check was made out to the order of Atlanta Classic Cars.

16. On the same day, BELLO used the cashier's check to purchase a 2012 Mercedes ML350, using the "James Richard" passport as identification.

17. On March 13, 2014, BELLO, representing himself as "James Richard," shipped the Mercedes to Co-conspirator A in Nigeria.

18. On February 14 and 18, 2014, BELLO wired funds from the Olushi account to overseas bank accounts, using the "James Richard" passport to authorize the wire transfers. Specifically, BELLO sent and caused to be sent the following two wire transfers from the Embury Hills SunTrust branch, located at 3603 Chamblee-Tucker Road, Chamblee, Georgia:

- a. On February 14, 2014, BELLO sent a wire transfer in the amount of \$150,000 to account #XXXXXXXXXX9301 at Emirates Bank in Dubai, United Arab Emirates.
- b. On February 18, 2014, BELLO sent a wire transfer in the amount of \$120,000 to account #XXXX8918 at HSBC Bank PLC in Coventry, Great Britain, held in the name of BELLO's brother.

All in violation of Title 18, United States Code, Section 1956(h).

Counts Four through Six

(18 U.S.C. § 1957)

Engaging in Monetary Transactions in Property Derived from Specified Unlawful Activity

19. The Grand Jury re-alleges and incorporates by reference Paragraphs 4 through 18, as if fully set forth herein.

20. On or about the dates set forth below, in the Northern District of Georgia and elsewhere, the defendant, OLANREWAJU SAHEED BELLO, a/k/a ANTONY ABEGUNRIN ADABA, a/k/a ANTHONY ADABA, a/k/a JAMES RICHARD, aided and abetted by others known and unknown to the Grand Jury, did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the withdrawal and wire transfer of funds, such property having been derived from a specified unlawful activity, that is, wire fraud, in violation of Title 18, United States Code, Section 1343.

COUNT	DATE	TRANSACTION	AMOUNT
4	2/14/2014	Purchase of cashier's check from the Olushi account (SunTrust Bank account #XXXXXXXXX8550), made out to Atlanta Classic Cars	\$45,350
5	2/14/2014	Wire Transfer from the Olushi account (SunTrust Bank account #XXXXXXXXX8550) to Emirates Bank account #XXXXXXXXX9301	\$150,000

COUNT	DATE	TRANSACTION	AMOUNT
6	2/18/2014	Wire Transfer from the Olushi account (SunTrust Bank account #XXXXXXXXX8550) to HSBC Bank PLC account #XXXX8918	\$120,000

All in violation of Title 18, United States Code, Sections 1957 and 2.

Forfeiture

21. The allegations contained in Counts One and Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(6).

22. Upon conviction of the offenses in violation of Title 18, United States Code, Section 1543 set forth in Counts One and Two of this Indictment, the defendants, OLANREWAJU SAHEED BELLO, a/k/a ANTONY ABEGUNRIN ADABA, a/k/a ANTHONY ADABA, a/k/a JAMES RICHARD, and OLUWAMATEMI ADUKE ALABI a/k/a OLUWAMATEMI ALABI a/k/a OLUWATEMI ALABI, shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(6):

- a. any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offenses; and
- b. any property, real or personal—
 - i. that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offenses, or

- ii. that was used to facilitate, or was intended to be used to facilitate, the commission of the offenses.

23. The property to be forfeited includes, but is not limited to, the following:

- a. The 2014 Honda Accord bearing Vehicle Identification Number ending in 6231;
- b. The 2006 Honda Element bearing Vehicle Identification Number ending in 1963;
- c. The 2011 Mercedes Benz ML350 bearing Vehicle Identification Number ending in 8827; and
- d. a money judgment.

24. The allegations contained in Counts Three through Six of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(1).

25. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Sections 1956(h) or 1957, the defendant, OLANREWAJU SAHEED BELLO, a/k/a ANTONY ABEGUNRIN ADABA, a/k/a ANTHONY ADABA, a/k/a JAMES RICHARD, shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

26. The property to be forfeited includes, but is not limited to, the following:

- a. The 2014 Honda Accord bearing Vehicle Identification Number ending in 6231;
- b. The 2011 Mercedes Benz ML350 bearing Vehicle Identification Number ending in 8827; and
- c. a money judgment.

27. If any of the property described above in Paragraphs 22-23 and 25-26, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

All pursuant to Title 18, United States Code, Sections 982(a)(6) and 982(a)(1),
and Title 28, United States Code, Section 2461(c).

A. True BILL
G. Payne
FOREPERSON

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